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 Designated Resident Nevada Counsel for Plaintiff

**UNITED STATES DISTRICT COURT  
 DISTRICT OF NEVADA (LAS VEGAS)**

BROWNING,

Plaintiff,

v.

LAS VEGAS METROPOLITAN  
 POLICE DEPARTMENT et al.,

Defendants.

Case No. 2:20-CV-01381-KJD-VCF

**STIPULATION AND ORDER TO  
 EXTEND DEADLINE FOR  
 RESPONSE TO (REFILED)  
 DISPOSITIVE MOTION**

(Second Request)

Now comes Betty Browning, Administrator of the Estate of Paul Browning, and Defendants, by and through their respective undersigned counsel, hereby and stipulate and agree that the response deadline for Plaintiff's response to Defendants' motion for summary judgment should be extended by one additional week, to July 31, 2023, and state as follows:

1           1.     Defendants refiled their motion for summary judgment on June 16,  
2 2023. Dkt. 81.

3           2.     The parties previously stipulated to and the Court granted one  
4 previous extension of one week for the filing of Plaintiff's response to summary  
5 judgment. Dkts. 82, 83. The response is currently due on July 24, 2023. Dkt. 83.

6           3.     Plaintiff's counsel is diligently working on the summary judgment  
7 response. However, an unexpected issue has arisen that will make it difficult for  
8 counsel to complete the motion by the current deadline of Monday, July 24, and  
9 Plaintiff requests one additional week, until Monday, July 31, 2023.

10           4.     Specifically, in one of Plaintiff's counsel's other cases, *Torres, et al. v.*  
11 *Los Angeles Sheriff's Dept.*, 2:22-cv-7450 (C.D. Cal.), the deposition of the main  
12 defendant is scheduled for Monday, July 24, 2023. The lead attorney representing  
13 Plaintiff was scheduled to take the deposition but now cannot do so because his  
14 wife's baby is arriving earlier than expected. She was in the hospital and has  
15 ongoing medical appointments and care due to the imminent birth. Moreover, the  
16 deposition cannot be rescheduled or postponed because the defendant is terminally  
17 ill and has surgery scheduled in the day or two after the deposition is scheduled to  
18 take place. Thus, undersigned Plaintiff's counsel (Elizabeth Wang), has to step in to  
19 take that deposition in that case on Monday, July 24.

20           5.     Good cause exists for granting this one-week extension of time, as  
21 described above.

22           6.     This request is not being submitted to unduly delay or prejudice any  
23 party but to ensure that Plaintiff has an adequate opportunity to present a fulsome  
24 response to Defendants' 54-page motion.  
25

26                               Respectfully submitted,

27                               /s/ Elizabeth Wang  
28

Elizabeth Wang  
Counsel for Plaintiff

/s/ Craig R. Anderson  
Craig R. Anderson  
Counsel for Defendants

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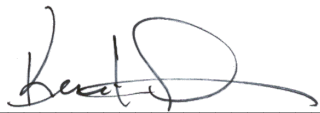
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**ORDER**

IT IS SO ORDERED that, based on the parties' Stipulation, and for good cause as described therein, Plaintiff's response to Defendants' motion for summary judgment will be due on July 31, 2023.

  
United States District Judge

**Certificate of Service**

I, Elizabeth Wang, an attorney, certify the foregoing was filed on July 19, 2023 via the Court's electronic filing system, which effected service on all counsel of record.

/s/ Elizabeth Wang